

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

STEVEN PLAVIN, on behalf of himself and all
others similarly situated,

Plaintiff,

V.

GROUP HEALTH INCORPORATED,

Defendant.

CASE NO.: 17-cv-01462-
RDM

Judge Mariani

Electronically Filed

**DEFENDANT GROUP HEALTH INCORPORATED'S UNOPPOSED
MOTION TO EXTEND TIME TO ANSWER, PLEAD, OR MOVE**

Defendant, Group Health Incorporated (“GHI”), by and through counsel,
files the within Unopposed Motion to Extend Time to Answer, Plead, or Move as
follows:

1. Plaintiff completed service of its Complaint upon GHI on or about August 18, 2017 by personal service.
2. The deadline to answer, plead, or move with respect to the Complaint is September 8, 2017.
3. The parties have jointly agreed to permit GHI an extension of time to answer, plead, or move until October 6, 2017.

4. The purpose of the proposed extension is to give GHI sufficient time to obtain information necessary to answer, plead, or move with respect to Plaintiff's Complaint.

5. GHI files this motion to memorialize the agreement among counsel regarding an extension of time to respond to the Complaint, and to seek the Court's approval of the same.

6. Counsel for GHI has conferred with counsel for Plaintiff, who consents to the filing of this Motion.

WHEREFORE, GHI respectfully requests that the Court grants this Unopposed Motion to Extend Time to Answer, Plead, or Move and allow GHI to respond to the Complaint on or before October 6, 2017.

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**pro hac vice motions forthcoming*

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By: /s/ Peter H. LeVan, Jr.

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*Attorneys for Defendant Group
Health Incorporated*

Dated: September 7, 2017

CERTIFICATE REGARDING CONCURRENCE

I certify that by email dated September 5, 2017, my co-counsel sought concurrence from counsel for Plaintiff in this motion. By email dated the same day, counsel for Plaintiff consented to GHI's request for an extension of time to answer, plead, or moved until October 6, 2017.

/s/ Peter H. LeVan, Jr.

CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing document was served this
7th day of September 2017 via electronic means upon the following:

Bill Carmody
Arun Subramanian
Ryan C. Kirkpatrick
Halley W. Josephs
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/s/ Peter H. LeVan, Jr. _____

*Attorneys for Defendant Group
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